

JMM:MPC
F.#2012R00285

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U S DISTRICT COURT E D N Y

★ DEC 19 2013 ★

LONG ISLAND OFFICE

- - - - - X

UNITED STATES OF AMERICA

- against -

MONA OWENS,

Defendant.

- - - - - X

THE UNITED STATES ATTORNEY CHARGES:

I N F O R M A T I O N

CR No. **13 233**
(T. 18, U.S.C., §§ 641,
981(a)(1)(C) and 3551
et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C.,
§ 2461(c))

FEUERSTEIN, J

WALL, M.J.

THEFT OF BENEFIT CHECKS

1. On or about and between June 5, 2005 and March 15, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MONA OWENS did knowingly and intentionally steal, purloin and convert to her own use money and things of value of an agency of the United States, which exceeded the sum of \$1,000, to wit: approximately \$87,403.00 in benefit checks issued by the Social Security Administration pursuant to the Retirement Survivors Disability Insurance Program.

(Title 18, United States Code, Sections 641 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon her conviction of the above-charged offense,

the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, that constitutes or is derived from proceeds as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;


d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p))


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK